

TOM RICHEY 929044
WASHINGTON STATE REFORMATORY
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

THOMAS W S RICHEY,
Plaintiff,
v
D. DAHNE,
Defendant.

NO. C12-5060 BHS

MOTION TO COMPEL
DISCOVERY

Plaintiff, Thomas W S Richey, prose, hereby submits this motion pursuant to FRCP 34(b)(2) to compel Defendant to provide documents.

FACTS

On 2 August 2019, Richey filed or attempted to file a Request for Production of Documents in this case. EX-1 Richey also mailed a copy of his request to the Defendant. Among other things, Richey specifically and explicitly requested Defendant to produce: ① The

Richey -- 1

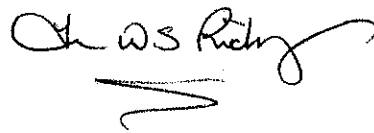
November 2011 Stafford Creek Corrections Center (sccc) Intensive Management Unit (IMU) Behavioral Logbook; (2) the identities of the staff who worked in the sccc IMU in November 2011; and, (3) the identities of the inmates assigned to sccc IMU in November 2011.

Defendant has not complied with Richey's request. The Defendant has an obligation to secure all evidence that is or may be related to this case. Richey has a right to that evidence. The sccc IMU Behavioral Logbook will show entries by the staff that his yard, shower and shower roll were denied him as Richey complained of in his grievance. The identities of the staff will identify the extremely obese Hispanic female guard who denied him yard etc, allowing Richey to subpoena her to appear at the evidentiary hearing for questioning regarding the incident, and the identities of prisoners assigned to sccc IMU in November 2011 will allow Richey to subpoena their testimony from observing the facts asserted by Richey.

Defendant knows from reading the Behavioral Logbook that Richey's factual assertions are true, and that he was baited by comments in his letter, and this explains why he has not complied with

Richey's discovery requests. Richey has a right to review all of the evidence and the Defendant should therefore comply with Richey's discovery request. The evidentiary hearing should be stayed as a sanction until Defendant complies with Richey's discovery requests.

Dated this 14th day of September 2019

A handwritten signature in black ink, appearing to read "Tom WS Richey", with a stylized flourish underneath.

TOM WS RICHEY

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From: ECF@wawd.uscourts.gov
Sent: Friday, August 2, 2019 4:46 PM
To: ECF@wawd.uscourts.gov
Subject: Activity in Case 3:12-cv-05060-BHS Richey v. Dahne Notice to Filer

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U.S. District Court

United States District Court for the Western District of Washington

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Case Name: Richey v. Dahne
Case Number: [3:12-cv-05060-BHS](#)
Filer:
Document Number: No document attached

Docket Text:

NOTICE TO FILER: Your document "Plaintiff's Request for Production of Documents and Interrogatories" will not be filed in this case.

Per LCR 5 (d), discovery documents are not to be filed in your court case. **0 PAGE(S), PRINT NEF ONLY (Thomas Richey, Prisoner ID: 929444)(SP)**

3:12-cv-05060-BHS Notice has been electronically mailed to:

Haley Christine Beach HaleyB@atg.wa.gov, CORreader@atg.wa.gov, corolyaef@ATG.WA.GOV

Thomas W.S. Richey docmccinmatefederal@DOC1.WA.GOV

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